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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington D.C. 20554

In the matter of	)	
	)	
An Allocation of Spectrum for	)	RM-9267
Private Mobile Radio Services	)	
	)	

To : The Secretary ,

Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

" I am writing in opposition to the LMCC proposal in RM-9267 to re-allocate the Amateur Radio420-450 MHz bands to shared access to private land mobile services."

Private land mobile and Amateur Radio do not have mutually compatible interests. Sharing between private land mobile and Amateur Radio is just not workable.

The 420-450 MHz Amateur Radio band is the second most used UHF/UHF allocation of the Amateur Radio Service. Specifically the 420-450 MHz band is one of the main bands used for Emergency Communications Support, (By Amateur Radio Operations) to the public, in times of natural disasters. RM-9267 would greatly compromise this vital public service.

Amateur Radio Operations have shared, can share, and will continue to share our UHF/UHF allocation with mutually compatible services, such as government organizations. But sharing between Private Land Mobile Services and the Amateur Radio Service is incompatible and totally unworkable.

I respectfully request that you DENY the LMMC proposal in RM-9267 to share the Amateur Radio allocations at 420-430 and 440-450 MHz.

Sincerely,

Al Young (N2BVX)
111 Puha Road
South Plainfield , NJ 07082

028

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

5.29.98

In the matter of RM9267:

I have been involved with producing high dynamic range VHF and UHF receivers and filters for eliminating interference both in the amateur and commercial radio service for many years. I am convinced that the two services cannot exist in the same bands without substantial interference. Coming from the Southern California area where amateur and commercial spectrum is valuable and over-crowded, the idea of sharing spectrum is poor engineering at best. Simple RF engineering principles will always prove that point.

If the LMCC really feels they can share then let's make the Amateur Radio Service primary and let them see how well they can survive in a shared service band segment. Obviously there can be no shared bands especially in areas where there are several million people and thousands of users, amateur and commercial.

I really believe that using the "lower system costs" idea as justification for eliminating yet another piece of amateur radio spectrum is out of line. The system costs will be the same regardless of the frequency and regardless of the duplex band separation. The LMCC should be seriously looking at other under-utilized bands such as the soon to be available VHF television frequencies or the 225 to 400 MHz military band. If planned correctly that band could be utilized much more efficiently.

The LMCC should be a little more patient and dispense with their "immediate need" frame of mind. The Amateur Radio Service nor any other service should not be in a position of having to immediately do anything. It makes for poor decisions for which we will all eventually suffer, amateur and commercial alike.

E.R. (Chip) Angle N6CA
PO Box 35
Lomita CA 90717-0035

Northeast Kentucky Anesthesia P S C

Drawer AF
Russell
Kentucky
41169-0528

Stephen A. Gates MD
President

DOCKET FILE COPY ORIGINAL

May 28, 1998

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

RECEIVED
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FCC MAIL ROOM

Dear Sirs:

Re: File number RM-9267

On April 22, 1998, the Land Mobile Communications Council (LMCC) filed a petition for rulemaking with the Federal Communications Commission. This petition (designated RM-9267) seeks to reallocate the frequency bands 420–430 MHz and 440–450 MHz (part of the 70 cm band) for the use of the Private Mobile Radio Service.

The frequency bands referenced by the petition are now heavily used by radio amateurs, operating in the FCC-licensed Amateur Radio Service, for a variety of public service and public interest communications. In my locality, several active Amateur Radio Emergency Service chapters have provided services including disaster communications during floods and storms(sometimes when local police radio, cellular, and land telephone services have been rendered inoperable by severe weather) and search and rescue. We use 440–450 MHz for simplex and radio repeater communications, and we also make use of amateur television (ATV), operating on 420–430 MHz. Granting primary use of 420–430 MHz and 440–450 MHz to LMCC is incompatible with these operations.

As a medical advisor to the Eastern Region of the National Cave Rescue Commission, I am also involved with search and rescue activities over a broader area. In the mountains of Virginia and West Virginia, local terrain variations and repeater siting often permit clear communication (either simplex or via repeater) on the 70 cm band when communication on other frequency bands is obscured. Again, the LMCC proposal is incompatible with the provision of prompt and clear emergency communications.

Reallocation of the 420–430 MHz and 440–450 MHz frequency bands as requested by LMCC will also lead to increased congestion on the already-crowded 2 meter band, rendering this band even less useful for public service operations. It will also have a significant negative personal financial effect on me (and on many other amateurs) by rendering almost useless a large base of installed equipment which currently operates on the 420–430 MHz and 440–450 MHz frequency bands, including amateur radio repeaters, base stations, ATV stations, and mobile and portable stations.

As a radio amateur licensed by the FCC (I hold an Amateur Extra Class license), I am dismayed by the LMCC proposal. **I ask that you deny the petition for rulemaking filed by the LMCC, RM-9267.**

Sincerely,

Tel 606 327 2222

FAX 606 329 9128

E-mail sgates@wwd.net

Stephen A. Gates MD
KO4LF

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OET

May 23, 1998

Federal Communications Commission
Secretary of the FCC, ROOM 222
1919 "M'' Street, NW
Washington, DC.
20554

RE: RM 9267

To: The Commission:

As a licensed Amateur Radio operator and System Trustee for over 20 years on the 420-450 MHz. band/segments, I wish to put forward my **strongest objection** to the petition under consideration, RM- 9267. Our systems, consisting of, "mobile relays", control links (i.e. point to point duplex voice and control data) and repeaters, located on 5 mountain and hilltop locations in California's "central coast" and the San Francisco bay region. These systems cover over 15 counties and range coverage exceeds 70,000 square miles. This system has in the past and, at a moment's notice, will be available to serve the public welfare and safety in any disaster or emergency.

I am a trustee for an amateur radio group here in Northern California, with almost 50 members. We use our equipment daily on these segments not to mention other systems and/or repeaters and a large sampling of other frequencies. Were we (plus the other 500 + systems and/or repeaters) forced to relocate or construct on other spectrum segments (existing, proposed and/or imagined), I firmly believe the following would occur:

> coordinated 420/440 systems would face a "no vacancy" sign at the door on any existing amateur band that they might try to relocate on, by any stretch of one's imagination.
>
> Individual operators would scatter to the remaining bands, which would produce chaos. The LMCC claims that PMRS would be unable to share or coexist with CMRS on any segment or band, because they would be eventually be forced off by the sheer magnitude of CMRS numbers and their style of operation.

If this would be the case, then why in a possible similar shared assignment with amateurs, would the outcome be any different with the amateurs becoming the losers? This is because of the difference between their style of short transmission with immediate availability versus the possible longer transmissions of amateurs. The LMCC

states that FEMA and CSAA need new or additional segment space to satisfy their needs. (See document paragraph 62 viz "primary" and "backup": comm-capabilities to nuclear facilities, utilities, et cetera, plus "operational areas".)

Also, CSAA to police and emergency road services, (ed. I seriously doubt that CSAA has a direct radio link with "local emergency dispatch". This would be monopolistic and unfair to other tow truck operators and owners. I am aware that in the Bay Area, tow calls are done on a rotation basis.) Nevertheless, these communications could best be done by microwave relay above 2.0Ghz with interfaces on site to conventional services.

It is blatantly apparent by reading RM 9267 that LMCC either has "NO-CLUE!" or they have viewed amateur radio's use of the 420-430, 430-440 and 440-450Mhz SEGMENTS from an extremely, regionalized and narrow perspective!

In no way do I wish to minimize the value or importance of amateur "satellite" or "amateur-television" which the LMCC briefly mentioned (See document, paragraph 73) but those endeavors only represent 1% of the amateur community's use and air-time is even less!. They operate in a small percentile of spectrum within the 430-440Mhz segment! The LMCC's obvious oversight ignores the mass 99% of amateurs such as myself and our members who are voluntarily coordinated, occupy and use all these above segments virtually all the time (every day).

I live in Santa Cruz city and county in California, a half mile from the serious damage the downtown area suffered in the 1989 Nisene-Marks/Loma-Prieta (San Francisco) earthquake and I personally have suffered from it's long-term effects. Besides its devastation, I have witnessed the "El Nino" driven storms producing floods and mudslides in 1982 and again in 1997-98. "Ham" radio operators on 70Cm helped tremendously, contributing to great public good, often times under poor and trying circumstances. If amateurs were to be removed or relocated, the net result would be denigrating and devastating to Amateur Radio emergency communications and to their ability to respond to future event challenges. It is apparent by a careful reading of RM 9267, that LMCC, representing PMRS, paints a picture of a plethora of difficulties between PMRS, CMRS and between PMRS, CMRS and the FCC! To expect the "amateur community" to be a scapegoat and succumb to this morass of current circumstances is, in my view, totally unacceptable, intolerable and just plain wrong!

Finally, the financial cost to our system (not

including engineering costs),would be as follows:

5 mobile relays at $45,000.00 each
11 duplex links at $ 25,000.00 each
Totaling: $500,000.00!

I and my group support the filings of:

Andrew Milton Jensen, N5IA, SOUTHERN CALIFORNIA REPEATOR AND REMOTE BASE ASSOCIATION (SCRRBA) and the AMERICAN RADIO RADIO RELAY LEAGUE (ARRL) Newington, CT.

Amateur Radio operations in Northern California are a vital radio communications resource to the public during emergencies and disasters. This resource will be irreparably damaged by the loss of forty-nine percent of all the available VHF/UHF amateur spectrum below 900Mhz. I urge the Commission in the **strongest terms possible** to **DENY ALL** of the specified portions pertaining to 70CM and segments.

Sincerely,

Thomas Joseph Robinson

THOMAS JOSEPH ROBINSON
115 Clay Street
Santa Cruz, CA
95060
P.O. Box 24855
San Jose, CA
95154

Federal Communications Commission
Secretary of the FCC, Room 222
1919 M Street, N.W.
Washington, D.C. 20554

May 28, 1998

RE: RM 9267

Dear Commission:

This letter contains my comments regarding petition RM-9267. These comments are about the part of this petition to reallocate frequencies in the 420 – 440 MHz and 440 – 450 MHz sub-bands.

First: About myself
I have been a licensed Amateur Radio operator since 1971. I hold an amateur extra class Radio license, callsign: N7CK. I also hold a lifetime General Radio Telephone Operator License. I have also been a voluntary frequency coordinator for the 420 – 450 MHz amateur bands since 1981 working with the Amateur Radio Council of Arizona. I have been actively involved in building and maintaining a number of amateur radio complex linked repeater systems for the past 25 years.

Second: About the petition
One of the first things I noticed about the rulemaking petition was the following paragraph:
4. Nearly all of the FORTUNE 500 companies have at least one radio system licensed in the private radio services. The top 10 industrial companies have more than 6,000 private land mobile licenses.

I think this paragraph shows the strategy of the LMCC. They are aligned with the fortune 500 companies and their purpose is to make money. Amateur Radio, on the other hand is a public resource and amateurs are forbidden by Part 97 of the commission's rules from using their frequency allocations for monetary gain. Almost all equipment used in the amateur service comes out of individual amateur's pockets, rather than the coffers of large Fortune 500 companies. Thus any damage done by shifting frequency allocations will hurt individuals, many of whom would suffer personal financial hardship.

The petition assumes many things. One of which is that the military is willing to part with the frequencies in question. In my personal experience, having been the recipient of (lawful) interference when using the 420-450 MHz band, I know that the military is still actively using these frequencies. As secondary users, amateurs live with the type of broadband interference that comes from the military radiolocation operations. On the other hand, the petition does not show how any sharing of the frequencies would be possible. As a matter of fact, the LMCC states the opposite:
57. Having absolute control over their communications network is essential for many PMRS users.

Third: Amateur use of the band
In Arizona, the 420-450 MHz band is most used of all the amateur VHF-UHF allocations. There are more coordinated repeaters and point-to-point links in this band than in all the VHF amateur bands. Growth in the amateur use of this band has been phenomenal over the past 15 years that I have been a frequency coordinator. We have experienced an increase of over 500% in repeater construction and operation. (Source: ARCA frequency database).

In Arizona, there are 240 repeaters (voice and data between 440 and 450 MHz) and 159 point-to-point links (between 420 and 430 MHz) coordinated. (Coordinated repeaters are a large percentage, but not all of the repeaters in operation.) There is also one television repeater and a number of outputs of crossband television repeaters in this band. These repeaters are located at virtually every mountaintop electronic site in the state.
It is easy to see that causing any changes in the allocation table would require amateur operators to make many expensive changes to their equipment.
One estimate for having the repeater systems changed would show the cost at approximately $25,000 for a turnkey system change per repeater and $10,000 per link. We also estimate a conservative average of 30 users per repeater, with one portable ($300), one mobile ($600) and one base station ($700) per user. Doing the math shows a displacement cost of approximately $19,110,000 not counting moving the amateur television repeaters. Remember this is the damage to individual amateurs, not to large fortune 500 companies.

Amateur radio in Arizona has been active in public service and the frequencies in question have been heavily used in previous disaster communications: Personally, I helped relay traffic from California during the Northridge earthquake which was passed via one network of linked repeaters on the 420 and 440 MHz sub-bands. During the floods in 1983, statewide communications were also provided by linked repeaters using the frequencies in question. Much amateur experimentation takes place especially with remote control, complex networking systems and advanced linking techniques. I have been personally involved in much systems construction and experimentation on these sub-bands over the years I have been involved in amateur radio.

Fourth: Sharing issues
Starting with the LMCC petition, it is obvious that sharing of channels with users in other services is not their intent:

39. Time sharing of channels in a given geographic area is very spectrum efficient for multiple small users, but only when their modes of operation and technology use are quite similar.
Mixing isochronous voice and asynchronous data services has always been a problem, engendering channel monitoring issues. Generally the "solution" was to depress the use of data, an important application for PMRS users. Mixing transmission technologies, i.e. analog and digital voice, is also problematic and will become more common in the

"post-refarming" environment. Similarly, mixing different channel bandwidths also causes substantial compromises and, eventually, when all bands are narrowed, yields greater adjacent channel interference levels.

Amateurs are successful sharing their frequency allocations among modes as diverse as CW, Weak signal work, satellite operations, FM repeaters, and Fast Scan television. The LMCC proposal seems to say that sharing is difficult. In no way have they shown any technical solutions to sharing the band with amateurs or with the military for that matter. Any reallocation of the spectrum from 420 - 430 and 440 – 450 MHz will preclude amateur operations in this spectrum.

In conclusion, if this petition is granted, hundreds of amateur repeaters will be displaced at the cost TO INDIVIDUALS of millions of dollars in Arizona, amateur radio's public service ability will be diminished and the shared nature of this band will no longer exist.

I urge the Commission to DENY the above specified portions of RM-9267.

Sincerely,

Michael Bucciarelli
(N7CK)

Denver Radio League
2055 South Madison Street
Denver, Colorado 80210
303-756-5278

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
Proposed Reallocation of 420	)	
To 430 MHz and 440 to 450 MHz	)	**RM 9267**
From the Federal Government to	)	
The Private Mobile Radio Service	)	

May 27, 1998

The Denver Radio League

The Denver Radio League is a group of 75 licensed radio amateurs who operate Very High Frequency (VHF) and Ultra High Frequency (UHF) amateur radio repeater systems in the Denver metro area. In addition to our 75 members, there are non-member amateur radio operators, both itinerate users traveling through Denver and local non-members who use these open access systems. In a year's time period, it would not be unusual to hear hundreds of different amateur radio operators using our systems.

440-450 MHz Spectrum Is Used For Community Service

Radio repeaters utilizing the 440-450 MHz spectrum directly support activities which benefit the health, welfare and security of the general public. These activities include

voice and data communication support for local officials addressing disasters, including tornadoes, blizzards and floods. Our radio repeater systems also provide health and welfare communications for disaster victims, freeing up the "air time" of public safety communication systems.

Amateur radio facilities are frequently the only operating voice communication systems following a local disaster. Increasingly, the United States' telecommunications infrastructure is being designed and constructed based on a "lowest cost of service" (make more money) concept rather than a "value of service". This means that the quality, redundancy and capacity of the public telephone infrastructure (both wired and wireless) is frequently not built to meet the same standard of service that it formerly was (prior to deregulation of the industry). These public communication systems will not survive local and regional disasters – loss of service will become more frequent. The public will continue to depend on communications provided by amateur radio repeater systems.

On a more frequent basis, our amateur radio repeaters support search efforts for missing persons, local parades, charitable events and severe weather warnings. The use of amateur radio facilities will become more important in the future as the commercial sector places more emphasis on competition and less on the quality of their service. Witness the poor or non-existent service that cellular systems provide during "rush hour", in addition to total outages of service during storms and emergencies. This gap in available local communication service has historically been filled by amateur radio communications, a large percentage using the 440 – 450 MHz spectrum.

440-450 MHz Spectrum Is Used For Essential Control Links

Loss of the 440-450 MHz spectrum would impact more than the UHF repeater systems. The Denver Radio League also operates amateur radio repeaters in the 146 and 224 MHz portions of the radio spectrum. *Every one of these systems uses 445 MHz control links.* These links are used for essential control functions, enhancing the reliability and functionality of each one of the systems they support.

The LMCC Has Failed To Assess The Impact of "Refarming"

The Federal Communications Commission implemented new rules and regulations for the commercial radio services that encourage spectrum efficiency (to yield more communication channels).[1] Commonly referred to as the "Refarming" rules, these guide lines allow private land mobile radio licensees to operate on narrower radio channels, potentially yielding up to four radio channels in the spectrum presently occupied by one channel. In addition, these new rules also allow centralized trunking on frequencies below 512 MHz.[2]

Has the private land mobile radio community taken advantage of these opportunities to gain more radio channels and more "air time" ? From our observations, it appears that little centralized trunking or narrowbanding is taking place in the private land mobile radio spectrum below 512 MHz. Refarming rules are not forced on these private land mobile licensees. They may elect to operate on narrower channels and use trunking if they so desire. If they are pressed for spectrum, why haven't we seen more of this technology

[1] Rules adopted in the First Report and Order of the FCC's PR Docket No. 92-235.
[2] Rules adopted in the Second Report and Order of the FCC's PR Docket No. 92-235.

placed in service? **Implementation of new narrow band technologies and trunking (in the bands below 512 MHz) would alleviate much of their claimed spectrum shortage.**

Summary

There are other options which the private land mobile radio community may take to gain additional spectrum, including use of "Refarming" technologies. The amateur radio spectrum at 420-430 MHz and 440-450 MHz, both directly and indirectly, well serves the general public. A loss of this spectrum would be a severe blow to the amateur radio community and an incalculable loss to community service in the United States.

Respectfully submitted,

George R. Stoll

George R. Stoll
President
Denver Radio League

Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of RM-9267
(An Allocation of Spectrum for Private Mobile Radio Services)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

My name is Michael Mercado, I want to go on record as being strongly "AGAINST" the petition under consideration, RM-9267.

Over the past twenty years as a radio retailer & repair specialist, I have had the opportunity to serve as communications and coordination advisor for a host of local, regional and federal entities. (F.E.M.A., DEA, FBI, Secret Service, INS, USDA, Local Police/Fire, Corporations and Foundations)

As a commercial LMR dealer, my families livelihood greatly depends on profits from new commercial frequency allocations similar to these as proposal by the LMCC in RM-9267. I oppose this particular proposal by the LMCC, from the standpoint that it's proposed "Need" is far out-weighed by its detriment to the "Public Good".

I am also an Active Radio Amateur (KM6NP). I currently serve as trustee for two separate 420-450 mhz repeater systems and the over four hundred amateurs that make up their membership throughout the State of California. I also serve as a volunteer emergency preparedness consultant, licensing instructor and lecturer, member RACES, ARES, ARRL, American Red Cross and numerous other organizations, donating hundreds of hours annually in both the amateur and public sectors.

During a period of the past decade, I have personally participated in public emergency service activities, coordinated on these sub bands, that number in the hundreds. These activities have included everything form Earthquake/Flood Relief, Law Enforcement Search & Rescue, Emergency Fire Evacuation efforts, to everyday highway and weather related welfare traffic. As a Radio Professional, I can guarantee that during many of these situations, these amateur communications served as "THE FIRST AND ONLY RELIABLE COMMUNICATIONS".

The frequencies bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television, voice and digital repeater systems that are used daily by amateurs not only in California, but throughout the West and Nationally.

Amateur Radio has proven to be a successful secondary user to the government radio location operations on these frequency bands. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, these frequencies serve many as their primary spectrum use.

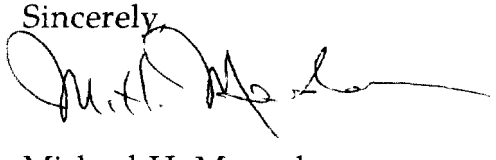
RM-9267 contains no technical solutions to prove that Amateur Radio users could continue to use these bands without serious interference if land mobile communications became the primary user. Commission approval of any PMRS (or similar) allocation on this, or any amateur, frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations Nation-Wide, which are a vital communications resource to the public during emergencies and disasters, will be very badly damaged by the loss of 49% of the Amateur VHF-UHF spectrum between 30 and 900 MHz.

As part of EVERY DAY life on these frequency sub bands, Radio Amateurs create and maintain development areas for experimental communications modes, complex computer linking techniques, remote control of transmitters and receivers. Not only the spectrum use, but the atmosphere of public service and emergency preparedness has historically led to technological advances that have become profit centers by the commercial sector.

Wearing both commercial and amateur hats on this issue, gives me a unique prospective of this proposal. I trust that you will consider this part of the proposal, as I do, a "LOOSE-LOOSE" situation for both sides of the issue.

In closing, I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission begin the process to restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz, for the BEST OF THE PUBLIC GOOD.

Sincerely,



Michael H. Mercado
17054 Magnolia Street
Fountain Valley, California 92708
April 29, 1998 - Via Fed Ex

Voice: (714) 375-0388
Fax: (714) 375-0389
E-Mail: km6np@electronictimes.com

DOCKET FILE COPY ORIGINAL

Gary Parvin
1803 Arminda
Kirkwood, Mo. 63122-5310
KB0OAW

Federal Communication Commission
1919 M Street N. W.
Washington DC 20554
Re: RM9267

Greetings;

In reference to petition RM9267, I am an amateur radio operator and I am concerned about losing operating privileges on the 70 cm band. Amateur operators, personally and through radio clubs, have a considerable amount of money invested in equipment for this band. This equipment is not only used for personal enjoyment but also at community events for communication. These same stations and operators are available in times of disasters to provide emergency communication when the regular emergency service bands are overloaded and phone service is disrupted.

The 70 cm band is used extensively as links between 2 meter repeaters. The loss of this band would severely limit coverage of repeaters that use these links.

Please keep in mind the thousands of amateur operators and our years of public service while considering petition RM9267.

Thank you sincerely,

Gary Parvin

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DOCKET FILE COPY ORIGINAL

2421 Orange Ave
Moraine Ohio 45439
(937) 299-1066
27 May 1998

Office of the Secretary,
Federal Communications Commission,
Room 222,
1919 M Street NW, Washington, DC 20554.

RE: RM-9267

To the Honorable Commissioners:

I am writing in regards to the Land Mobile Communications Council petition (designated RM-9267) that seeks to reallocate the frequency bands 420-430 and 440-450 MHz for the use of the Private Mobile Radio Service. These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations.

The personal impact of this proposal, if adopted, will be to render thousands of dollars of my radio equipment instantly unuseable. This portion of the spectrum is my primary area of operation, and loss of it would force me onto other, increasingly crowded bands.

In addition to the personal impact, the loss of these frequencies would adversely affect the public service and emergency operations provided by radio amateurs. The loss of equipment and trained operators would be equivalent to millions, if not billions, of dollars worth of lost capabilities to local, state and federal government agencies. I would suggest that you consult the National Weather Service and The Federal Emergency Management Agency as to the worth of these services. While much of our operations in these areas take place in the 144 MHZ band, the threatened frequencies are used for voice and packet links that support these operations in the background.

In closing, I strongly urge you to deny RM-9267. Thank you for your time and consideration.

Sincerely,

Randolph E. Allen, KAØAZS

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Office of the Secretary
Federal Communications Commission
Room 222, 1919 M Street NW
Washington, DC 20554

Dear Sirs:

I am writing in regard to RM-9267. It has come to my attention that the Land Mobile Communications Council has filed a petition for rule making concerning the 420-450 MHz band of frequencies.

As an amateur radio operator using this band frequently, I think it would interfere with my use of this band. As an amateur, the band is used for emergency communications, weather spotting, experimenting, amateur television, packet operations, and satellite operations to name a few. I understand the military also has use of this band.

I think the LMCC should explore other options. Thank You for your consideration.

Sincerely,

Bobby G. Lewis

Bobby G. Lewis
192 Northview Rd.
Blanchester, Ohio 45107-8770

No. of Copies rec'd 5
List A B C D E OET

Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: **RM - 9267**

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles, and repeaters assigned to businesses, leaving amateurs and their established emergency communication networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

RECEIVED
JUN 1 1998
FCC MAIL ROOM

Sincerely,

ARS KG6IBJ

No. of Copies rec'd 5
List A B C D E OET

May 27, 1998

1108 E. Rahn Road
Dayton, OH 45429-6110

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

RE: comments Opposing RM-9267

Dear Sir:

I am filing these comments in opposition to Petition for Rulemaking RM-9267, filed by the Land Mobile Communications Council (LMCC).

I have been involved in amateur radio for 28-years. I presently hold an Amateur Extra license in addition to a General Radiotelephone Operator License (formally Second Class). I am an active user of the amateur radio bands between 40-meters and 33-centimeters. I am presently station committee chairman for the Miami Valley FM Association of Amateur Radio Operators, Inc. (MVFMA). This is a public service organization that maintains three FM repeaters, one of which is within the frequency range affected by RM-9267. In filing these comments, however, I speak only for myself and not MVFMA.

Relocating primary status of 420-430 MHz and/or 440-450 MHz to the Private Mobile Radio Service would have a significant adverse affect on the amateur radio community. Amateur radio stations using various modes of communications heavily utilize these band segments. LMCC has claimed, without evidence or justification, that amateur radio stations could operate in this spectrum on a secondary basis with PMRS. Having previously been employed as a systems engineer in the Private Mobile Radio Service I am convinced that this would not be possible. Should PMRS become the primary user I believe the amateur radio service would be significantly disrupted and may prove to be entirely impractical.

This proposal would also have a significant economic impact on me as well as thousands of other amateur radio operators. We have made significant investment in equipment for use on these frequencies.

I am personally involved in the operation of a voice repeater in the 440 - 450 MHz segment. Several thousand dollars have been invested not including many hours of effort to maintain this system. In addition I am involved in a 19.2 kbps data network that uses frequencies in the 420 - 430 MHz segment. This network provides amateur radio data communications between Columbus, Cincinnati, and Dayton, Ohio. Loss of these

frequencies would remove the primary packet radio link in southern Ohio. At least $5,000 of radio equipment would be lost, not including the many man-hours to implement and maintain this system.

In addition to systems that I am involved with there are several other amateur radio services supported in the 420 – 430 MHz and 440 – 450 MHz segment in southwestern Ohio. Emergency communications for severe weather spotters (Skywarn) is one example. Equipment for this activity was purchased by individuals to provide a public service. Several of these individuals do not have the economic means to loose this investment and relocate.

I believe that adoption of RM-9267 would significantly damage the Amateur Radio Service and its ability to comply with the ARS charter to serve the public interest. It would also hurt individuals who have invested in amateur radio equipment to support that charter. This petition should be denied.

Respectfully submitted,

Michael D. Suhar
Amateur Radio Station WB8GXB

Enclosure: Original and four copies

FEDERAL COMMUNICATIONS COMMISSION
1919 M Street NW Room 222
Washington D.C. 20554

In the Matter of RM 9267 - Proposed Reallocation of 420 to 430 MHz from the Federal Government to the Private Mobile Radio Service.

Dear Sir:

I have been a amateur radio operator for 37 years. I am active on HF and VHF bands. I am editor of my local radio club's newsletter and try to keep abreast of emergency services needs in the community. VHF and UHF frequencies are vital for these services.

Today there are more than 800,000 licensed amateur operators. Many of the new amateurs are of the "no code" level of licensing limiting them to the 144, 220 and 440 MHz frequency bands along, with the old timers. The new amateurs as well as the old amateurs use the 440 MHz band for "communication" and also for "public service" and "emergencies." California is known for our earthquakes and fires. Most recently, El Niño with fires and flooding. In my local area packet radio and RACES programs are used around the clock on a daily basis. These modes of operation utilize the 220 and 440 MHz frequency spectrum. In my opinion the proposed changes would prove detrimental to the provision of emergency services by the amateur radio community.

I certainly hope the F.C.C. sees and understands this critical situation and allows the amateur bands to remain as they are.

Respectfully,

Robert E Painter

Robert E. Painter, WA6PLM
8145 Carnation Drive
Buena Park, CA. 90620

RM-9267

May 27, 1998

Office of the Secretary
Federal Communications Commission
Room 222
1919 M. Street NW
Washington, DC 20554

RE: RM-9267

Dear Sir;

I would like to register my opposition to Proposal RM-9267.

As a licensed amateur radio operator for the past several years, I have become active in the local Amateur Radio Emergency Services (ARES) organization. Our responses to community emergency needs have involved the use of simplex frequencies as well as local and linked repeater frequencies.

It is my feeling that reallocation of the requested portions of the 70 cm band will result in erosion of the ability of amateur radio operators to respond efficiently to the emergency needs of our communities. I believe, as does ARRL, that the proposal is not compatible with continued amateur use of the band.

Thank you for your time.

Sincerely,

John V. Curry
KC7EBL
1317 Hollins
Helena, MT 59601-1818

DOCKET FILE COPY ORIGINAL

28 May 1998

RM-9267
Secretary, Federal Communications Commission
1919 M St NW
Washington, DC 20554

Sirs;

I wish to comment in opposition to the reallocation of 420 to 430 MHz and 440 to 450 MHz from amateur radio to private mobile radio service.

I recognize that amateur radio has a secondary assignment to these frequencies but we have operated successfully for years sharing the band with radar and other navigation devices. The proposed primary private radio assignment would be highly unlikely to permit useful secondary and non-interfering amateur use.

There are presently over 450 coordinated voice and data repeaters in this range in southern California alone; virtually evey available high level frequency pair is used and re-used. I personally use some of these facilities in support of the Amateur Radio Emergency Service (ARES) and Radio Amateur Civil Emergency Service (RACES) communications both on voice and data. A mobile television system primarilly for emergency local government support is now being funded. None of these things or the many people who support them could co exist as a secondary assignment with commercial radio. I urge you not to severely damage the existing amateur public service capability by making this proposed frequency reassignment.

Sincerely,

Bruce E. Gordon

Bruce E. Gordon N6OLT
445 S. Walnut Lane
Santa Barbara, CA 93111

Christopher Kent
KG2NP
195 N. Franklin Turnpike
Ramsey, NJ 07446

RM-9267
Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

This letter is to express my opposition to RM-9267. As one of 700,000 licensed amateur radio operators, I feel re-allocation of 420-430 MHz and 440-450 MHz is ill advised.

This is the second most popular VHF/UHF band in the amateur service, and the only band in this portion of the spectrum where ATV (amateur television) is permitted.

The band is used extensively for public service as well as routine amateur applications.

Re-allocation of this band would impose significant economic hardships on amateur licensees, as well as exert an adverse effect on amateur radio emergency communications capabilities.

Thank you for your kind consideration.

Sincerely,

Chris Kent

Christopher Kent

cc--American Radio Relay League